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December 13, 2021

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
P.O. Box 1088  
201 High Street SE, Suite 100  
Salem, Oregon 97308-1088

**Re: Docket UG 435 - Northwest Natural Gas Company's Application for a General Rate Revision.**

Attention Filing Center:

Attached for filing in the above-referenced docket is Northwest Natural Gas Company's Motion for General Protective Order, expedited consideration is requested.

Please contact this office with any questions.

Sincerely,

Alisha Till  
Paralegal

Attachment

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UG 435

In the Matter of

NORTHWEST NATURAL GAS COMPANY,  
dba, NW Natural,

Application for a General Rate Revision

**MOTION FOR GENERAL  
PROTECTIVE ORDER**

Expedited Consideration Requested

1 Pursuant to ORCP 36(C)(1), OAR 860-001-0080, and OAR 860-001-0420, Northwest  
2 Natural Gas Company (“NW Natural” or the “Company”) moves for the entry of the Public Utility  
3 Commission of Oregon’s (“Commission”) general protective order in this proceeding to protect  
4 commercially sensitive and confidential business information related to the Company’s  
5 forthcoming application for a general rate revision.

6 In support of this Motion, the Company states:

7 1. The Commission’s rules authorize NW Natural to seek reasonable restrictions on  
8 discovery of trade secrets and other confidential business information. See OAR 860-001-  
9 0080; ORCP 36(C)(1) (providing protection against unrestricted discovery of “a trade secret or  
10 other confidential research, development, or commercial information”); see also *In re*  
11 *Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351, Order  
12 No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect “the  
13 rights of a party to trade secrets and other confidential commercial information” and “to facilitate  
14 the communication of information between litigants”).

15 2. NW Natural will soon file an application for a general rate revision (“Application”).  
16 The Application will include confidential testimony and exhibits and, pursuant to OAR 860-022-  
17 0019(2)(a), responses to the Commission’s Standard Data Requests, some of which will contain  
18 confidential information. This information is confidential and commercially sensitive and  
19 constitutes “Protected Information” because it includes proprietary cost data and models,

1 commercially sensitive load projections, confidential market analyses and business projections,  
2 confidential employee data, confidential information regarding contracts for the purchase or sale  
3 of natural gas, and commercially sensitive vendor contracts. Additionally, NW Natural expects  
4 that other types of commercially sensitive information may later be requested or required in  
5 discovery and subsequently filed testimony.

6 For the foregoing reasons, NW Natural requests entry of a general protective order in  
7 this docket.

Respectfully submitted this 13th day of December 2021.

By: **McDOWELL RACKNER GIBSON PC**



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**NORTHWEST NATURAL GAS COMPANY**

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